



National Pork Producers Council

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Mississippi River/Gulf of Mexico Action Plan (4503R)
c/o U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

To Whom It May Concern:

NPPC appreciates the opportunity to submit these comments regarding the U.S. Environmental Protection Agency (EPA) *Draft Action Plan for Reducing, Mitigating and Controlling Hypoxia in the Northern Gulf of Mexico*. First, I want to describe NPPC and whom we represent. Second, I want to discuss the programs NPPC has successfully been undertaking the past few years to improve environmental performance of pork producers. Third, I wish to comment on the Draft document itself.

The National Pork Producers Council is a national association representing 44 affiliated states that annually generate approximately \$11 billion in farm gate sales. According to a recent Iowa State study, the U.S. pork industry supports an estimated 600,000 domestic jobs and generates more than \$64 billion annually in total economic activity. With 10,988,850 litters being fed out annually, U.S. pork producers consume 1.065 billion bushels of corn valued at \$2.558 billion. Feed supplements and additives represent another \$2.522 billion of purchased inputs from U.S. suppliers which help support U.S. soybean prices, the U.S. soybean processing industry, local elevators and transportation services based in rural areas.

Pork producers clearly recognize our responsibility for a clean environment, and have demonstrated a willingness to take an objective look at our own practices on the farm and to commit millions of our own checkoff dollars to find the scientific answers we need to address environmental challenges.

In 1997, pork producers, and representatives from EPA, USDA and the states developed a comprehensive set of regulatory recommendations for pork production that included: new permit provisions; manure management requirements; setbacks from water sources and neighboring residences; and operator training and certification.

NPPC has an array of ongoing environmental research and education programs designed to help producers with everything from understanding proper nutrient management techniques to identifying effective and practical odor reduction technologies.

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In order to improve the environmental performance of thousands of farms nationwide, NPPC in 1998 began the On-Farm Odor/Environmental Assistance Program (OFO/EAP). Under the program, unique to agriculture pork producers receive a comprehensive assessment of their farm's environmental practices by trained third party inspectors. The program identifies specific odor and water quality risk areas on the farm. The areas evaluated include: facility and equipment maintenance; manure storage structure integrity and operation; manure handling; land application practices; and manure nutrient management and contingency planning. America's pork producers provided \$1.5 million for the development of the assessment protocol, which was developed by professional engineers and consultants from the USDA Natural Resources Conservation Service, Extension Service and private industry. The site assessment protocol was verified for thoroughness by a third-party verification firm and by EPA.

Recognizing the importance of controlling odor, the pork industry has also committed to a multi-million dollar program to test the effectiveness of innovative odor reduction technologies. Under the Odor Solutions Initiative, mechanical, biological and chemical odor treatment technologies will be tested in laboratories and on farms. Significant investments of producer checkoff funding have also been allocated on specific odor and water quality research projects at 16 universities.

The pork industry has also developed the Environmental Assurance Program, a comprehensive continuing environmental education program delivered at the local level. More than 10,000 producers have participated in the program.

And each year, NPPC honors as Environmental Stewards five producers who are doing an outstanding job of environmental management in five key areas: manure management systems, aesthetics and neighbor relations, wildlife management, innovation and financial management.

NPPC strongly believes that successful plans to reduce nutrient losses to the environment will be built on scientifically sound best management practices which includes programs like NPPC's OFO/EAP program, in combination with science-based, affordable and achievable regulations.

The following represents NPPC's position concerning *the Draft Action Plan Addressing Hypoxia in the Gulf of Mexico*.

1. Quantitative Goal (20-40% Nitrogen Reduction)

Fertilization from agricultural production is not the sole source of nutrients (nitrogen) within the basin; however, the action plan appears to focus almost exclusively on agriculture. Soil degradation and atmospheric deposition are two very big contributors that this action plan fails to address. Fertilizer inputs have increased greatly since 1945; however, crop yields (especially corn) also have greatly increase significantly. The amount of nitrogen removed by crop harvest is significantly greater than the amount of fertilizer applied to cropland, according to the Topic 3 Report by USGS and NOAA.

Not all fertilizer sold in the Mississippi River basin is used as fertilizer. Large amounts are used as deicing compounds on highways and airports and considerable amounts are used in resin manufacturing. Also, much if the fertilizer sold as "agricultural" fertilizer is used in suburban/urban environments and not by the agricultural sector. All these nitrogen sources must be considered within any program that is established for the Basin.

Important and significant Federal agricultural and environmental protection programs have been created and implemented during the last 15 years. While water quality responses in the lower Mississippi Basin may not yet be detectable, it is commonly understood that a significant “lag” time (decades) always exists between the time programs are implemented, Best Management Practices (BMPs) are installed, and results are realized.

For example, the Conservation Reserve Program (CRP) has removed millions of acres of agricultural land from production. These lands are no longer being fertilized, eroding and producing sediments and adsorbed nutrients. The Wetlands Reserve Program (WRP) has restored more than 745,000 acres of wetlands in the Basin that are filtering runoff and removing nutrients from the river system

The 1985 and 1996 Farm Bills led to Best Management Practices being installed on and erosion/sedimentation reduced on most of the cropland in the United States. Additionally the United States Department of Agriculture’s Environmental Quality Incentive Program (EQIP) and the Environmental Protection Agency’s 319 programs have resulted in BMPs being installed on thousands of acres of land and non-point source runoff reduced. Finally, thousands of miles of buffers have been installed that trap and filter pollutants from surface and shallow groundwaters. Monitoring and modeling efforts need to predict the cumulative improvements expected from all of these significant accomplishments.

It is also pointed out that there was very little agreement between the States on the goals of the Draft Action Plan at the June 15-16, 2000, Nutrient Task Force Meeting in St. Louis, Missouri. There were seven States represented at the meeting and only two agreed to a quantitative goal, with the other five adamantly opposed. The States and Tribes should support any quantitative goal because they will ultimately be responsible for implementation leadership.

2. Funding

Identifying financial incentives is important, but we are concerned that the budget proposal does not adequately identify critical and essential technical assistance dollars so that federal agencies will be able to provide needed technical services. USDA, for example, cannot commit to any additional workload without reducing current priority technical services to landowners and conservation districts. This would create an unacceptable tradeoff between equally vital technical service needs.

The Draft Action Plan suggest that federal agencies will direct the Environmental Quality Incentive Program (EQIP), the Conservation Reserve Program (CRP), the Wetlands Reserve Program (WRP), and other environmental restoration programs into state targeted watersheds within the Basin. New appropriated funds for increased technical and financial assistance, not redirection of existing funds, are needed to accelerate the work that currently is being done throughout the Basin. To date, approximately 77% of the total EQIP funds, 75% of the total CRP acreage, 89% of the WRP acreage, and 68% of the total WHIP funding have been obligated in the 31 Mississippi River Basin States. Directing any additional funds from these various programs into the Basin would have significant negative impacts on other high priority

geographic area across the nation, such as the Colorado Salinity Project, the Chesapeake Bay Program, and the Everglades Initiative.

3. Impacts of current activities/work.

The Action Plan needs to recognize the past and present achievements by agriculture producers in reducing nutrient losses through stewardship and voluntary assistance programs. There are many efforts underway in the Mississippi/Atchafalaya River Basin. The Action Plan should complement and accelerate these efforts. Before any acceleration of on-the-ground implementation occurs, a complete assessment of current conservation and non-point source pollution control efforts must be done to determine their cumulative impacts on the nutrient loading in the Mississippi/Atchafalaya River Basin. There are many local, State, Tribal, and Federal programs and initiatives underway, yet the Integrated Assessment did not consider their cumulative impacts on the nutrient-loading problem. We must know what the impact of our current efforts will be before identifying how much more needs to be accomplished.

We at NPPC are strongly committed to reducing nutrient loss in the environment. Any "Action Plan" to reduce nitrogen loss in the environment should: 1) not be based on a strict numeric/quantitative goal that does not examine all of the contributors of nitrogen in the Basin; 2) provide funding for science and other nutrient management programs, such as conservation buffers and other BMPs aimed at reducing nitrogen loss; and 3) recognize the private land conservation practices and credit agriculture for the reductions in nutrient losses that have occurred over the past decade.

Sincerely,

Roy Henry
Chairman
Environmental Committee